

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, *et al.*,

Plaintiffs,

v.

JASON KESSLER, *et al.*,

Defendants.

Civil Action No. 3: 17-cv-00072-NKM

JURY TRIAL REQUESTED

PLAINTIFFS' DEPOSITION DESIGNATIONS

Plaintiffs, by and through their counsel, respectfully submit the following designations of deposition testimony.

Plaintiffs reserve the right to: (a) use audio and/or video deposition excerpts and/or create demonstrative exhibits; (b) use any deposition designations listed by Defendants; (c) supplement these designations with those of any persons listed as trial witnesses by any party in the event that such witnesses are not available to testify at trial or are not called at trial; (d) designate additional portions of deposition transcripts for the purpose of authentication of documents, if required; (e) designate any deposition testimony taken after the date of these designations; and (f) use any and all deposition and/or trial testimony, whether or not designated, for cross-examination, impeachment, or rebuttal purposes.

Deposition Transcript:	Designations:
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<p>Nationalist Socialist Movement 30(b)(6), Designee: Burt Colucci, December 10, 2019</p>	<p>8:9 - 8:19 10:1 - 10:4 13:21 - 13:23 14:1 - 14:8 22:18 - 23:23 25:18 - 26:9 37:6 - 38:9 40:3 - 40:10 41:5 - 41:10 41:23 - 42:12 42:20 - 43:5 45:22 - 46:1 46:3 - 46:8 47:21 - 48:12 51:5 - 51:7 69:22 - 70:4 70:21 - 70:24 73:22 - 73:24 120:1 - 120:11</p>

	<p>123:1 - 123:7 123:23 - 124:15 128:10 - 128:13 128:21 - 130:13 141:25 - 142:14 143:7 - 143:15 147:22 - 147:23 (Ends with “496.”) 148:2 - 148:22 184:6 - 186:1 186:20 - 187:9 187:16 - 187:25 189:13 - 189:24 197:23 - 199:12 219:14 - 219:22 220:17 - 221:4 230:24 - 232:18 238:5 - 238:25 259:15 - 260:13</p>
<p>Nationalist Socialist Movement 30(b)(6), Designee: Burt Colucci, August 11, 2020</p>	<p>13:14 - 13:15 25:15 - 25:25 93:14 - 93:17 96:11 - 96:21 96:25 - 97:4 109:8 - 109:10 109:20 - 111:22 123:20 - 124:19 125:14 - 127:9 133:8 - 133:19 147:2 - 147:5 148:11 - 149:12 150:9 - 150:18 151:18 - 151:24 152:14 - 153:8 161:17 - 162:16 173:3 - 173:24 175:22 - 177:10 177:18 - 177:23 198:3 - 198:9 198:14 - 199:7 202:3 - 202:5 202:20 - 203:11 204:4 - 204:7 204:15 - 204:19 204:25 - 205:8 205:21 - 206:7 206:16 - 207:21</p>

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	357:3 - 357:10

	<p>360:24 - 361:19 386:8 - 386:11 (Starting with “And”) 388:10 - 389:4</p>
Vasillios Pistoris, July 22, 2020	<p>10:2 - 10:21 11:24 - 12:2 12:18 - 12:23 13:4 - 13:11 29:7 - 29:8 31:19 - 31:21 35:3 - 35:10 36:22 - 37:19 40:24 - 42:14 42:18 - 43:7 47:20 - 47:24 51:22 - 52:24 53:5 - 53:18 54:25 - 55:4 55:11 - 57:7 58:17 - 58:21 58:24 - 58:25 59:4 - 59:8 59:11 - 59:16 59:22 - 60:11 60:14 - 60:17 61:2 - 61:15 61:24 - 62:14 62:18 - 62:19 63:6 - 64:4 65:6 - 65:8 65:16 - 66:5 66:7 - 67:11 68:6 - 68:23 69:15 - 70:15 70:25 - 71:3 71:8 - 71:17 72:15 - 72:19 73:14 - 73:23 74:9 - 74:10 74:22 - 75:25 76:16 - 76:19 77:15 - 77:24 78:8 - 78:16 79:2 - 79:8 80:10 - 82:7 82:11 - 82:13 82:21 - 82:22</p>

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Thomas Rousseau, October 16, 2019	<p>9:22 - 10:8 11:25 - 12:17 20:18 - 22:2 22:9 - 22:23 23:17 - 25:3 25:15 - 26:7 103:21 - 104:21 105:4 - 105:18 112:16 - 112:18 117:10 - 117:16 124:14 - 125:10 129:15 - 129:17 130:4 - 130:20 141:23 - 142:12 151:3 - 151:8 169:14 - 169:20 172:12 - 172:18 177:14 - 177:22 178:7 - 178:12 182:16 - 184:14 202:19 - 203:4 209:22 - 210:14 222:13 - 222:19 240:25 - 243:9</p>
Vanguard America 30(b)(6), Designee: Dillon Hopper, July 7, 2020	<p>7:19 - 8:2 9:21 - 9:24 12:20 - 13:19 14:8 - 14:21 25:3 - 26:2 28:22 - 29:7 30:18 - 30:23 31:10 - 31:24 32:12 - 39:6 39:20 - 41:5 41:8 - 41:19 45:9 - 45:15 47:15 - 49:8 52:15 - 52:22</p>

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Vanguard America 30(b)(6), Designee: Thomas Rousseau, July 22, 2020	<p>11:3 - 11:12 14:4 - 14:7</p>

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Dated: October 4, 2021

Respectfully submitted,

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